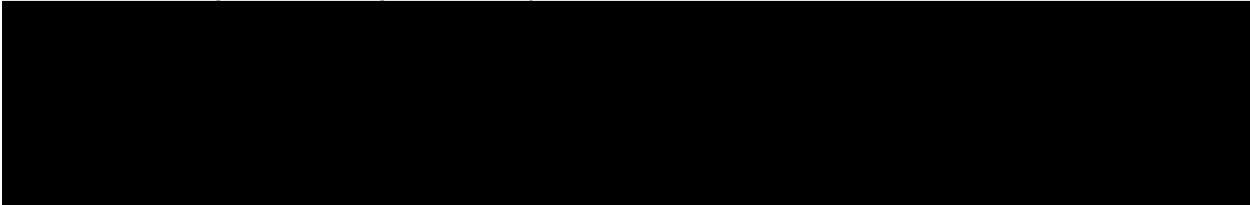


To: McQueen, Jacqueline[McQueen.Jacqueline@epa.gov]
Cc: Walt Sanders[wsanders@vmgthehill.com]
From: Rom Reddy
Sent: Fri 10/30/2015 12:12:22 PM
Subject: Re: Question

Yes, you are correct. This is a voluntary standard. There is no guideline or standard issued by any governmental agency for turf or crumb in turf. Therefore, the industry has been using children's toys and urban/rural soils as a voluntary standard. Over the last decade, independent labs, academics and some states have conducted various tests which have validated the compliance with these voluntary standards as well as compliance with Prop 65, CHHSL, EU 71-3 and various other guidelines. To our knowledge, there has not been a single, published, leave alone peer reviewed study that would indicate any form of non compliance vs any logical baseline. Most discussions revolve around a base line of zero by which almost anything in our daily lives save a sterile bubble would fail.

Regards,
Rom

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.



Hi Rom and thanks.

What I am trying to determine is whether this is a voluntary standard or not. On the Synthetic Turf Council website, there is a document dated August 2015 that discusses the standard for metals. It uses the words "suggested" and "voluntary." Is this accurate? I want to make sure I am characterizing this correctly. Thanks.

Jackie

Jacqueline McQueen
U.S. Environmental Protection Agency (8104R)
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From: Rom Reddy [mailto:romreddy@sprinturf.com]
Sent: Thursday, October 29, 2015 4:09 PM
To: McQueen, Jacqueline <McQueen.Jacqueline@epa.gov>
Cc: Walt Sanders <wsanders@vmgthehill.com>
Subject: Question

Jackie, my name is Rom Reddy and I am the Managing Partner of Sprinturf—one of the 3 member Safe Field Alliance team. I have attached a test done by Labosport, a world renowned lab that does all the tests for FIFA. As u can see from the test, the values compare the test for crumb rubber vs the very stringent European Union Toy standard. The US toy standard specifies a 100 ppm limit for one of the heavy metals---lead that has received the most attention. However, all the other heavy metals that are less critical than lead also test less than 100 ppm. If u combine the lead levels in the green blades and the lead levels in crumb rubber, they both test less than 100 ppm. Ditto for other heavy metals. The EPA guideline for these metals in urban soils is 400ppm. Hope this provides some clarity. These tests are duplicated by almost any other certified lab.

Rom Reddy